

# Click4Support, LLC

## The Violation: Privacy



- Click4Support, LLC, a tech support company, bilked consumers out of more than \$17 million by pretending to represent Microsoft, Apple and other major tech companies, using internet ads and popups that mimicked those of the well-known companies. The company trapped consumers into calling them and then told those customers that their computers contained malware, viruses or security breaches. The hapless consumers were subjected to a high-pressure sales pitch for unnecessary tech support plans and repair services, and the defendants obtained their payment information to charge them hundreds and sometimes thousands of dollars



- Under the terms of the preliminary injunction order of the court, the defendants must stop their deceptive and unfair practices and are subject to an asset freeze while the case against them progresses

# IAP Worldwide Services, Inc.

## The Violation: FCPA



- IAP Worldwide Services, Inc., a Florida defense and government contracting company, conspired to bribe Kuwaiti officials in order to secure a lucrative contract
- The company colluded with Kuwait's Minister of the Interior on a scheme involving the Kuwait Security Program, a project intended to provide nationwide surveillance capabilities for Kuwaiti government agencies using closed-circuit television. The scheme ensured that IAP worked as a consultant on Phase I of the project in order to tailor the requirements for the bidding process for Phase II to its advantage and win the contract



- IAP agreed to pay \$7.1 million to resolve the government's FCPA investigation
- The company must conduct a review of its existing internal controls, policies and procedures and to make any modifications necessary to maintain accurate record keeping and a rigorous anti-corruption compliance program

# Lakeland Eye Clinic

## The Violation: Gender Discrimination



- Lakeland Eye Clinic discriminated based on sex by firing an employee because she is transgender, was transitioning from male to female, and did not conform to the employer's gender-based expectations
- The employee had performed her duties satisfactorily during the term of her employment. When she began to present as a woman and informed the company she was transgender, the company fired her



- The company agreed to settle the case by entering into a two-year consent decree which includes injunctive relief and \$150,000 in monetary damages

# Opus & Best Law Services LLC

## The Violation: Fraud



- Former international legal advisor Bobby Boye created a sham legal and accounting firm called Opus & Best Law Services in order to defraud a foreign nation of more than \$3.5 million
- Under the auspices of the sham company, Boye submitted a fraudulent bid for a contract with the foreign nation while recommending Opus to the country, which awarded Opus the contract and wired money to Opus's business checking account
- Boye used the money to purchase real estate, luxury vehicles, and designer watches.



- Boye must pay \$3.5 million in restitution and serve 72 months in prison followed by three years of supervised release

# Flint Hills Resources

## The Violation: Environmental Pollution



- Chemical manufacturer Flint Hills, whose materials are used in a variety of products, improperly operates its steam-assisted flaring devices so that excessive amounts of VOCs, such as benzene, are emitted into the atmosphere. These chemicals can cause substantial harm to public health by irritating the lungs, exacerbating diseases such as asthma, and increasing vulnerability to respiratory ailments. The company also violates regulations designed to limit emissions from leaking equipment.



- Flint Hills Resources agrees to implement innovative technologies to control dangerous pollution, for an estimated cost of \$28 million. To further mitigate the impact of pollution, it will spend another \$2 million on a diesel replacement project and \$350,000 on technologies to reduce energy demand in low-income homes. Per the settlement agreement, the company will publish online the monitoring data it has collected to identify and reduce potential pollution sources for communities around its facility.

# Ranbaxy USA Inc.

## The Violation: Fraud and False Claims



- Between 2003 and 2007, Ranbaxy USA Inc., (part of Indian Ranbaxy Laboratories, Ltd.) manufactures, distributes and sells drugs whose strength, quality or purity differs from the drug's specifications. The FDA's inspections of the company's Indian plants find incomplete drug testing records and inadequate testing procedures. The company fails to correct the violations and to file required reports for certain drugs but continues to sell them. The company knowingly allows false claims for those drugs to be submitted to Medicaid, Medicare, and other federal agencies.



- Ranbaxy pleads guilty to felony charges and agrees to pay a criminal fine of \$150 million. In addition, under a civil settlement, the company agrees to pay another \$350 million to resolve false claims allegations, of which the federal government will receive \$231.8 million and the states participating in the agreement will receive the remaining \$118.2 million. Whistleblower Dinesh Thakur, a former Ranbaxy executive, will receive approximately \$48.6 million from the federal share of the settlement amount.

# Bank of America

## The Violation: Discrimination



- Bank of America engages in discriminatory practices, in violation of the Fair Housing Act and the Equal Credit Opportunity Act, by requiring loan applicants with disabilities to provide letters from their doctors to document income received from Social Security Disability Insurance (SSDI).



- Bank of America agrees to revise its policies, conduct employee training (for underwriters and loan officers) and offer compensation to victims. The company will pay \$1,000, \$2,500 or \$5,000 to eligible loan applicants who were required to provide medical information to document their income. Bank of America will also hire a third party administrator to search the database of loan applications involving SSDI income to identify other possible victims.